Rural Cellular Corporation
Implementation Plans of Wireless E911 Phase II
Automatic Location Identification

Pursuant to the Commission=s wireless enhanced E911 rules, this letter serves as the report on Implementation Plans of Wireless E911 Phase II Automatic Location Identification for Rural Cellular Corporation and its affiliated corporations, as identified below (ARCC@). RCC operates wireless networks in primarily rural markets in 14 states. RCC=s network technology varies by market and includes TDMA, GSM and analog networks.

Background/Contact Information

1. Carrier Information

TRS ID	Legal Carrier Name	Mailing Address
815018	Rural Cellular Corporation	P.O. Box 2000, Alexandria, MN 56308
815105	MRCC, Inc.	P.O. Box 2000, Alexandria, MN 56308
817680	RCC Atlantic, Inc.	P.O. Box 2000, Alexandria, MN 56308
815019	Wireless Alliance, LLC	P.O. Box 2000, Alexandria, MN 56308
(Applied for)	RCC Holdings, Inc.	P.O. Box 2000, Alexandria, MN 56308
(Applied for)	RGI Group, Inc.	P.O. Box 2000, Alexandria, MN 56308
(Applied for)	RCC Minnesota, Inc.	P.O. Box 2000, Alexandria, MN 56308
	TLA Spectrum, LLC	P.O. Box 2000, Alexandria, MN 56308
	SRCL Holding Company, Inc.	P.O. Box 2000, Alexandria, MN 56308
	Saco River Communications Corporation	P.O. Box 2000, Alexandria, MN 56308
	New Hampshire Wireless,LLC	P.O. Box 2000, Alexandria, MN 56308

2. Contact Information

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E911 Phase II Location Technology Information

After evaluating network-based, handset-based and hybrid E911 solutions, RCC believes that the handset-based technology is its only viable option to meet its E911 Phase II obligations in its markets. The characteristics of RCC=s rural markets make it virtually impossible for RCC to deploy a network-based solution. Network based technologies require the use of cell sites in proximity to each other to triangulate a signal to obtain accurate location information. In most of RCC=s markets, the average distance between

its existing cell sites is too great to obtain accurate location information by triangulation, and the cost of adding additional cell sites to implement a network-based solution would far exceed the capital resources available to RCC.

1. Technology Choice:

RCC will be deploying a handset-based solution in each of the licensed areas set forth below.

AL-3 RSA	AL-4 RSA	AL-5 RSA
Bangor, ME MSA	Burlington, VT MSA	KS-1 RSA
KS-2 RSA	KS B 6 RSA	KS B 7 RSA
KS B 11 RSA	KS-12 RSA	KS B 13 RSA
MA- 1 RSA	ME B 1 RSA	ME B 2 RSA
ME B 3 RSA	MN B 1 RSA	MN B 2 RSA
MN B 3 RSA	MN B 5 RSA	MN B 6 RSA
MS B 1 RSA	MS B 3 RSA	MS B 4 RSA
NH B 1 RSA	NY B 2 RSA	OR B 4 RSA
OR B 3 RSA	OR B 6 RSA	SD B 4 RSA
VT B 1 RSA	VT B 2 RSA	WA B 2 RSA
WA B 3 RSA	WA B 8 RSA	Portsmouth-Dover-Rochester, NH-ME MSA

In each market, it is RCC=s intention to purchase location-capable handsets from Nokia, Motorola, NEC, Ericsson and others subject only to the availability of location-capable handsets from each equipment vendor. It is also RCC=s intention to obtain the necessary network hardware and software changes and/or upgrades to implement a handset-based solution. RCC=s current network vendors include Lucent, Nortel, Ericsson and Nokia.

RCC has a switch sharing arrangement with VoiceStream in the following licensed areas: partitioned areas of Duluth, MN BTA, Fargo, ND BTA, Grand Forks, ND BTA, Souix Falls, SD BTA, and Virginia/Hibbing, MN BTA. In these areas, RCC will be deploying the NSS/E-OTD approach, as approved by the FCC in its Fourth Memorandum Opinion and Order, dated September 8, 2000.

RCC through its various subsidiaries also holds licenses for St. Cloud, MN BTA, Roseburg, OR BTA, Medford-Grants Pass, OR BTA, Klamath Falls, OR BTA, Bend, OR BTA, Portland-Brunswick, ME BTA, and the Manchester-Nashua-Concord, NH BTA but has not yet commenced operations in these markets.

2. Testing and Verification: In all markets, RCC will use the empirical testing method per OET Bulletin No. 71

3. Implementation Details and Schedule:

   - It is RCC=s intention to begin selling and activating location-capable handsets by October 1, 2001 in each of its markets subject only to the availability of location-capable handsets from the handset vendors; and
   - It is RCC=s intention to install all necessary network hardware and software upgrades to timely deploy a handset-based solution in response to a valid Phase II request subject only to the availability of the network hardware and software necessary to deploy such handset-based solution.

4. PSAP Interface: RCC intends to work with each PSAP to mutually determine the best method of delivering Phase II information to that PSAP. It is RCC=s intention to deploy the necessary hardware and software changes to timely deliver the Phase II information after receipt of a valid Phase II request.

5. Existing Handsets: It is RCC=s intention to track its penetration rates of location-capable handsets among its subscribers. If needed, RCC will promote the purchase of location-capable handsets in order to achieve the 95% penetration of location-capable handsets among its subscribers by the FCC=s December 31, 2005 deadline.

6. Location of Non-Capable Handsets: It is RCC=s intention to employ a handset-based solution that will ensure that E911 calls coming from handsets that are incompatible with RCC=s technology solution will be delivered to the PSAP with E911 Phase I information.

7. Other Information: To date, RCC has not received a Phase II request.